

EXHIBIT 1

1 HANSON BRIDGETT LLP
2 KURT A. FRANKLIN, SBN 172715
3 kfranklin@hansonbridgett.com
4 LISA M. POOLEY, SBN 168737
5 lpooley@hansonbridgett.com
6 SAMANTHA WOLFF, SBN 240280
7 swolff@hansonbridgett.com
8 JENNIFER ANIKO FOLDVARY, SBN 292216
9 jfoldvary@hansonbridgett.com
10 425 Market Street, 26th Floor
11 San Francisco, California 94105
12 Telephone: (415) 777-3200
13 Facsimile: (415) 541-9366
14 HANSON BRIDGETT LLP
15 TYSON M. SHOWER, SBN 190375
16 tshower@hansonbridgett.com
17 LANDON D. BAILEY, SBN 240236
18 lbailey@hansonbridgett.com
19 500 Capitol Mall, Suite 1500
20 Sacramento, California 95814
21 Telephone: (916) 442-3333
22 Facsimile: (916) 442-2348
23 OTTEN LAW, PC
24 VICTOR OTTEN, SBN 165800
25 vic@ottenlawpc.com
26 KAVITA TEKCHANDANI, SBN 234873
27 kavita@ottenlawpc.com
28 3620 Pacific Coast Highway, #100
Torrance, California 90505
Telephone: (310) 378-8533
Facsimile: (310) 347-4225
18 Attorneys for Plaintiffs
19 CORY SPENCER, DIANA MILENA
20 REED, and COASTAL PROTECTION
21 RANGERS, INC.

22 **UNITED STATES DISTRICT COURT**
23 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

24 CORY SPENCER, an individual;
25 DIANA MILENA REED, an
individual; and COASTAL
26 PROTECTION RANGERS, INC., a
27 California non-profit public benefit
corporation,

28 CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' NOTICE OF
DEPOSITION OF
DEFENDANT ALAN JOHNSTON**

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

1 | Plaintiffs,

2 | v.

3 LUNADA BAY BOYS; THE
4 INDIVIDUAL MEMBERS OF THE
5 LUNADA BAY BOYS, including but
not limited to SANG LEE, BRANT
6 BLAKEMAN, ALAN JOHNSTON
7 AKA JALIAN JOHNSTON,
MICHAEL RAE PAPAYANS,
8 ANGELO FERRARA, FRANK
9 FERRARA, CHARLIE FERRARA,
and N. F.; CITY OF PALOS
10 VERDES ESTATES; CHIEF OF
11 POLICE JEFF KEPLEY, in his
representative capacity; and DOES
12 1-10.

13 Defendants

16 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

17 Please take notice that on June 30, 2017 at 9:00 a.m., Plaintiffs Cory
18 Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc.
19 ("Plaintiffs") will take the deposition of Defendant Alan Johnston at Premier
20 Business Center, One Park Plaza, Suite 600, Irvine, CA 92614,
21 (949) 852-4400. The deposition will be taken from day to day thereafter until
22 completed.

23 NOTICE IS FURTHER GIVEN that the deposing party intends to
24 cause the proceedings to be recorded stenographically through the instant

25 | //

26 | //

27 | //

28 //

1 visual display of the testimony and will also be recorded by videotape and
2 audiotape.

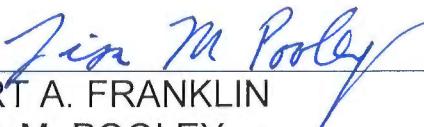
3 DATED: June 15, 2017

HANSON BRIDGETT LLP

4

5

6 By:


7 KURT A. FRANKLIN
8 LISA M. POOLEY
9 SAMANTHA D. WOLFF
10 JENNIFER ANIKO FOLDVARY
11 TYSON M. SHOWER
12 LANDON D. BAILEY
13 Attorneys for Plaintiffs
14 CORY SPENCER, DIANA MILENA
15 REED, and COASTAL PROTECTION
16 RANGERS, INC.

17

18

19

20

21

22

23

24

25

26

27

28

1 **PROOF OF SERVICE**
2 *Spencer, et al. v. Lunada Bay Boys, et al.*
3 (Case #2:16-cv-02129-SJO (RAOx))

4 **STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

5 At the time of service, I was over 18 years of age and not a party to
6 this action. I am employed in the County of San Francisco, State of
7 California. My business address is 425 Market Street, 26th Floor, San
8 Francisco, CA 94105.

9 On June 15, 2017, I served a true copy of the following document(s)
10 described as:

11 **PLAINTIFFS' NOTICE OF DEPOSITION OF**
12 **DEFENDANT ALAN JOHNSTON**

13 on the interested parties in this action as follows:

14 **SEE ATTACHED SERVICE LIST**

15 **BY MAIL:** I enclosed the document(s) in a sealed envelope or
16 package addressed to the persons at the addresses listed in the Service List
17 and placed the envelope for collection and mailing, following our ordinary
18 business practices. I am readily familiar with Hanson Bridgett LLP's practice
19 for collecting and processing correspondence for mailing. On the same day
20 that correspondence is placed for collection and mailing, it is deposited in
21 the ordinary course of business with the United States Postal Service, in a
22 sealed envelope with postage fully prepaid.

23 I declare under penalty of perjury under the laws of the United States
24 of America that the foregoing is true and correct and that I am employed in
25 the office of a member of the bar of this Court at whose direction the service
26 was made.

27 Executed on June 15, 2017, at San Francisco, California.

28 
Ann D. Ghiorso

SERVICE LIST
Spencer, et al. v. Lunada Bay Boys, et al.
(Case #2:16-cv-02129-SJO (RAOx))

Robert T. Mackey
Peter H. Crossin
Richard P. Dieffenbach
John P. Worgul
John E. Stobart
VEATCH CARLSON, LLP
1055 Wilshire Blvd., 11th Floor
Los Angeles, CA 90017

*(Attorneys for Defendant BRANT
BLAKEMAN)*

Tel: 213.381.2861
Fax: 213.383.6370
E-Mail: rmackey@veatchfirm.com
pcrossin@veatchfirm.com
rdieffenbach@veatchfirm.com
jworgul@veatchfirm.com
lstobart@veatchfirm.com

9 Robert S. Cooper
10 Audrey S. Olson
11 BUCHALTER NEMER, APC
1000 Wilshire Blvd., Suite 1500
Los Angeles, CA 90017

*(Attorneys for Defendant BRANT
BLAKEMAN)*

14 J. Patrick Carey
15 LAW OFFICES OF J. PATRICK
16 CAREY
1230 Rosecrans Ave., Suite 300
Manhattan Beach, CA 90266

(Attorney for Defendant ALAN
JOHNSTON a/k/a JALIAN
JOHNSTON)

19 Peter T. Haven
HAVEN LAW
1230 Rosecrans Ave., Suite 300
20 Manhattan Beach, CA 90266

(Attorney for Defendant MICHAEL RAY
PAPAYANS)

22 | Edwin J. Richards
23 | Antoinette P. Hewitt
24 | Rebecca L. Wilson
25 | Jacob Song
26 | Christopher D. Glos
27 | KUTAK ROCK LLP
28 | 5 Park Plaza, Suite 1500
29 | Irvine, CA 92614-8595

(*Attorneys for Defendants CITY OF
PALOS VERDES and CHIEF OF
POLICE JEFF KEPLEY*)

Tel: 949.417.0999
Fax: 949.417.5394
E-Mail: ed.richards@kutakrock.com
jacob.song@kutakrock.com
antoinette.hewitt@kutakrock.com
rebecca.wilson@kutakrock.com

1 Dana Alden Fox
2 Edward E. Ward, Jr.
3 Eric Y. Kizirian
4 Tera Lutz
5 LEWIS BRISBOIS BISGAARD &
6 SMITH LLP
7 633 W. 5th Street, Suite 4000
8 Los Angeles, CA 90071

(Attorneys for Defendant SANG LEE)

Tel: 213.580.3858
Fax: 213.250.7900
E-Mail: dana.fox@lewisbrisbois.com
edward.ward@lewisbrisbois.com
eric.kizirian@lewisbrisbois.com
tera.lutz@lewisbrisbois.com

6 Daniel M. Crowley
7 BOOTH, MITCHEL & STRANGE
8 LLP
9 707 Wilshire Blvd., Suite 4450
10 Los Angeles, CA 90017

(Attorneys for Defendant SANG LEE)

Tel: 213.738.0100
Fax: 213.380.3308
E-Mail: dmcrowley@boothmitchel.com

9 Mark C. Fields
10 LAW OFFICES OF MARK C.
11 FIELDS, APC
12 333 South Hope Street, 35th Floor
13 Los Angeles, CA 90071

*(Attorney for Defendant ANGELO
FERRARA and Defendant N. F.
appearing through Guardian Ad Litem,
Leonora Ferrara)*

Tel: 213.948.2349
Fax: 213.629.4520
E-Mail: fields@markfieldslaw.com

14 Thomas M. Phillips
15 THE PHILLIPS FIRM
16 800 Wilshire Blvd., Suite 1550
17 Los Angeles, CA 90017

*(Attorneys for Defendant ANGELO
FERRARA)*

Tel: 213.244.9913
Fax: 213.250.7900
E-Mail: tphillips@thephillipsfirm.com

18 Alison K. Hurley
19 Tiffany L. Bacon
20 BREMER WHYTE BROWN &
21 O'MEARA, LLP
22 20320 S.W. Birch St., 2nd Floor
23 Newport Beach, CA 92660

*(Attorneys for Defendants FRANK
FERRARA and CHARLIE FERRARA)*

Tel: 949.221.1000
Fax: 949.221.1001
E-Mail: ahurley@bremerwhyte.com
tbacon@bremerwhyte.com